

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROBERT BARTLETT and PATRICK	)
LEYDEN, Individually and on behalf of other	)
similarly situated SWAT team members on the	)
Chicago Police Department,	)
	)
Plaintiffs,	) Case No. 14 CV 07225
v.	) Judge Charles P. Kocoras
	) Hon. Magistrate Judge Sidney I.
	) Schenkier
	)
CITY OF CHICAGO,	)
	)
Defendant.	)

**DEFENDANT CITY OF CHICAGO'S ITEMIZATION OF ITS BILL OF COSTS**

Defendant, City of Chicago (“City”), by and through its attorneys, and pursuant to Local Rule 54.1, files this Itemization of its Bill of Costs<sup>1</sup> to be taxed against the Plaintiffs, including the named Plaintiffs, Robert Bartlett and Patrick Leyden, and all of the Plaintiffs who are members of the FLSA collective action and/or Rule 23 class action in this matter<sup>2</sup>, based on this Court’s entry of judgment in favor of the City on October 1, 2019 (Dkt. Nos. 257-258).

DEPOSITION TRANSCRIPT COSTS AND REPORTER FEES <sup>3</sup> – SEE EXHIBIT B									
Deponent	Date	Pages	Rate	\$/Pg	\$/Pg Adj.	Transcript Cost	Reporter Fee & Length	Reporter Fee- Adjusted	Total
Amelio, Paul <sup>4</sup>	5/19/16	165	Original	\$3.65	N/A	\$602.25	\$175.00 3.5 hours	\$110.00	\$712.25

<sup>1</sup> The Court’s form AO 133 Bill of Costs is attached as **Exhibit A**.

<sup>2</sup> As explained further in the City’s Memorandum of Law (Dkt. No. 262), this Bill of Costs also covers the 23 Plaintiffs in Case No. 18-cv-06468, *Armando Chagoya et al. v. City of Chicago*.

<sup>3</sup> Per page cost and court reporter attendance rates have been adjusted to conform to the rates allowed by the Northern District of Illinois. See *Transcript Rates*, available at <https://www.ilnd.uscourts.gov/Pages.aspx?rsp2kxYIAI6Z3skP0PESA+q3bXKkfRyo>.

<sup>4</sup> The City recently received the invoice for this deposition and is currently in the process of paying for this transcript.

<b>DEPOSITION TRANSCRIPT COSTS AND REPORTER FEES<sup>3</sup> – SEE EXHIBIT B</b>									
<b>Deponent</b>	<b>Date</b>	<b>Pages</b>	<b>Rate</b>	<b>\$/Pg</b>	<b>\$/Pg Adj.</b>	<b>Transcript Cost</b>	<b>Reporter Fee &amp; Length</b>	<b>Reporter Fee- Adjusted</b>	<b>Total</b>
Bartlett, Robert	5/22/15	324	Original	\$3.70	\$3.65	\$1,182.60	\$480.00 7.5 hours	\$220.00	\$1,402.60
Bartlett, Robert	8/25/15	53	Original	\$3.80	\$3.65	\$193.45	\$150.00 2 hours	\$110.00	\$303.45
Berry, Scott	7/13/16	165	Original	\$3.65	N/A	\$602.25	\$200.00 4 hours	\$110.00	\$712.25
Bowers, Joshua	6/24/16	109	Original	\$3.65	N/A	\$397.85	\$150.00 3 hours	\$110.00	\$507.85
Cano, Jesus	7/08/16	208	Original	\$3.65	N/A	\$759.20	\$225.00 4.5 hours	\$220.00	\$979.20
Cintron, Efrain	5/18/16	170	Original	\$3.65	N/A	\$620.50	\$200.00	\$110.00	\$730.50
Coyle, Richard	5/17/16	136	Original	\$3.65	N/A	\$496.40	\$175.00 3.5 hours	\$110.00	\$606.40
Cuomo, Andrew	5/18/16	162	Original	\$3.65	N/A	\$591.30	\$200.00	\$110.00	\$701.30
Dunn, James	6/27/16	142	Original	\$3.65	N/A	\$518.30	\$150.00 3 hours	\$110.00	\$628.30
Georgas, Steve	6/09/17	31	Original	\$4.10	\$3.65	\$113.15	\$0.00	N/A	\$113.15
Gibbs, Ronald	2/25/16	46	Original	\$3.55	N/A	\$163.30	\$0.00	N/A	\$163.30
Hroma, John	2/25/16	88	Copy	\$2.55	\$0.90	\$79.20	\$0.00	N/A	\$79.20
Joyce, Sean	7/12/17	101	Original	\$3.55	N/A	\$358.55	\$0.00	N/A	\$358.55
Kereakes, Anargyros	5/24/17	122	Copy	\$2.55	\$0.90	\$109.80	\$0.00	N/A	\$109.80
Lamb, Thomas	5/14/15	111	Copy	\$2.45	\$0.90	\$99.90	\$0.00	N/A	\$99.90
Leyden, Patrick	6/2/16	198	Original	\$3.65	N/A	\$722.70	\$225.00 4.5 hours	\$220.00	\$942.70
Wanger, Manzo	8/3/16	253	Original	\$3.65	N/A	\$923.45	\$225.00 4.5 hours	\$220.00	\$1,143.45
Marianovi ch, Mark	5/15/15	72	Copy	\$2.45	\$0.90	\$64.80	\$0.00	N/A	\$64.80
Molina, Luis	6/8/16	188	Original	\$3.65	N/A	\$686.20	\$275.00 5.5 hours	\$220.00	\$906.20
Nunez, Felipe	8/16/16	169	Original	\$3.65	N/A	\$616.85	\$175.00 3.5 hours	\$110.00	\$726.85

<b>DEPOSITION TRANSCRIPT COSTS AND REPORTER FEES<sup>3</sup> – SEE EXHIBIT B</b>									
<b>Deponent</b>	<b>Date</b>	<b>Pages</b>	<b>Rate</b>	<b>\$/Pg</b>	<b>\$/Pg Adj.</b>	<b>Transcript Cost</b>	<b>Reporter Fee &amp; Length</b>	<b>Reporter Fee- Adjusted</b>	<b>Total</b>
Quinones, Johnny	6/23/16	148	Original	\$3.65	N/A	\$540.20	\$175.00 3.5 hours	\$110.00	\$650.20
Razo, Alfredo	7/27/16	176	Original	\$3.65	N/A	\$642.40	\$150.00 3 hours	\$110.00	\$752.40
Rhein, Charles	2/25/16	61	Copy	\$2.55	\$0.90	\$54.90	\$0.00	N/A	\$54.90
Sebastian, Michael	6/24/16	145	Original	\$3.65	N/A	\$529.25	\$150.00 3 hours	\$110.00	\$639.25
Shen, David	6/27/16	135	Original	\$3.65	N/A	\$492.75	\$150.00 3 hours	\$110.00	\$602.75
Vasquez, Eduardo	5/26/16	179	Original	\$3.65	N/A	\$653.35	\$200.00 4 hours	\$110.00	\$763.35
Vasquez, Eduardo	7/12/17	44	Original	\$3.65	N/A	\$160.60	\$125.00	\$110.00	\$270.60
<b>DEPOSITION TRANSCRIPTS AND REPORTER FEES – TOTAL</b>								\$15,725.45	

<b>COURT HEARING TRANSCRIPTS – SEE EXHIBIT C</b>	
<b>Description</b>	<b>Amount Adjusted</b>
Transcript of hearing before the Honorable Sidney I. Schenkier on July 22, 2016	\$526.35
Transcript of hearing before the Honorable Sidney I. Schenkier on August 2, 2016	\$150.35
Transcript of hearing before the Honorable Sidney I. Schenkier on June 20, 2017	\$43.65
<b>HEARING TRANSCRIPT - TOTAL</b>	<b>\$720.35</b>

<b>COPYING COSTS – SEE EXHIBIT D</b>						
<b>Dkt. No.<sup>5</sup></b>	<b>Date Copy Was Made</b>	<b>Description</b>	<b>Pages</b>	<b>Copies</b>	<b>\$/Pg</b>	<b>Total</b>
17	11/7/14	Plaintiffs' First Amended Complaint ( <i>See Ex. D, p. 1</i> )	7	1	\$0.15	\$1.05
19- 23	11/14/14	City's Motion for extension of time to file answer regarding complaint; City's Motion to Dismiss Count II of Plaintiff's First Amended Complaint and supporting Memorandum of Law ( <i>See Ex. D, p. 1</i> )	38	1	\$0.15	\$5.70
31- 32	1/20/15	City's Motion for leave to file Amended Answer to First Amended Complaint ( <i>See Ex. D, p. 1</i> )	25	1	\$0.15	\$3.75

<sup>5</sup>

The City identifies the corresponding docket number, if applicable.

<b>COPYING COSTS – SEE EXHIBIT D</b>						
<b>Dkt. No.<sup>5</sup></b>	<b>Date Copy Was Made</b>	<b>Description</b>	<b>Pages</b>	<b>Copies</b>	<b>\$/Pg</b>	<b>Total</b>
	5/22/15	Copies related to document production to Plaintiffs. ( <i>See Ex. D, p. 1</i> )	558		\$0.15	\$83.70
59-60	9/18/15	City's Motion to Certify Class, Unopposed Motion for Certification and Approval of Class Notice for FLSA Collective Action and Rule 23 Class Action of State Wage and Hour Law Claims ( <i>See Ex. D, p. 1</i> )	16	1	\$0.15	\$2.40
80-81	2/25/16	City's Motion for extension of time to complete discovery ( <i>See Ex. D, p. 1</i> )	5	1	\$0.15	\$0.75
	3/14/16	Copies of documents related to a document production by the City to Plaintiffs. ( <i>See Ex. D, p. 1</i> )	61		\$0.15	\$9.15
	4/18/16	Copies of documents related to a document production by the City to Plaintiffs. ( <i>See Ex. D, p. 1</i> )	70		\$0.15	\$10.50
	5/2/16	Copies of documents related to a document production by the City to Plaintiffs. ( <i>See Ex. D, p. 1</i> )	1,093		\$0.15	\$163.95
	5/16/16	Copies of documents related to a document production by the City to Plaintiffs. ( <i>See Ex. D, p. 1</i> )	4,737		\$0.15	\$710.55
87-88	5/20/16	City's Motion for discovery and Agreed Joint Motion to Extend Class Discovery ( <i>See Ex. D, p. 1</i> )	7	1	\$0.15	\$1.05
	6/6/16	Copies for deposition exhibits for the June 8, 2016 deposition of Plaintiff Luis Molina ( <i>See Ex. D, p. 1</i> )	65		\$0.15	\$9.75
	6/21/16 and 6/22/16	Copies for deposition exhibits for the June 24, 2016 deposition of Plaintiff Josh Bowers ( <i>See Ex. D, p. 1</i> )	174		\$0.15	\$26.10
	6/25/16	Copies for deposition exhibits for the June 27, 2016 deposition of Plaintiff David Shen ( <i>See Ex. D, p. 1</i> )	57		\$0.15	\$8.55
	7/6/16 and 7/7/16	Copies for deposition exhibits for the July 8, 2016 deposition of Plaintiff Jesus Cano ( <i>See Ex. D, p. 1</i> )	33		\$0.15	\$4.95
96	7/11/16	Plaintiffs' response in opposition to the City's Motion to Compel (Dkt. No. 90) ( <i>See Ex. D, p. 1</i> )	20	1	\$0.15	\$3.00
	7/12/16	Copies for deposition exhibits for the July 13, 2016 deposition of Plaintiff Scott Berry ( <i>See Ex. D, p. 1</i> )	114	1	\$0.15	\$17.10

<b>COPYING COSTS – SEE EXHIBIT D</b>						
<b>Dkt. No.<sup>5</sup></b>	<b>Date Copy Was Made</b>	<b>Description</b>	<b>Pages</b>	<b>Copies</b>	<b>\$/Pg</b>	<b>Total</b>
100	7/14/16	City's Reply in Further Support of its Motion to Compel (Dkt. No. 90) ( <i>See Ex. D, p. 1</i> )	112	1	\$0.15	\$16.80
	8/3/16	Copies for deposition exhibits for the August 3, 2016 deposition of Plaintiff Wagner Manzo ( <i>See Ex. D, p. 3</i> )	51		\$0.15	\$7.65
133	4/17/17	City's Response to Plaintiffs' Motion to Compel (Dkt. No. 131) ( <i>See Ex. D, p. 2</i> )	32	1	\$0.15	\$4.80
139	6/14/17	City's Motion For Protective Order ( <i>See Ex. D, p. 2</i> )	43	1	\$0.15	\$6.45
	7/10/17 and 7/11/17	Copies for deposition exhibits for the July 12, 2017 continued deposition of Plaintiff Eduardo Vasquez ( <i>See Ex. D, p. 2</i> )	73		\$0.15	\$10.95
148-149, 151	7/27/17	City's Motion for Reconsideration regarding magistrate judge's rulings at the July 19, 2017 status hearing (Dkt. No. 147); Plaintiffs' Response to the City's Motion for Reconsideration (Dkt. No. 148) ( <i>See Ex. D, p. 2</i> )	51	3	\$0.15	\$7.65
154	8/4/17	City's Reply in Further Support of Its Motion for Reconsideration (Dkt. No. 148) ( <i>See Ex. D, p. 2</i> )	15	1	\$0.15	\$2.25
156	8/14/17	Plaintiffs' Motion to Compel Production of Emails ( <i>See Ex. D, p. 2</i> )	20	1	\$0.15	\$3.00
175-197	1/23/18, 1/31/18	City's Motion for Summary Judgment Submission; Plaintiff's Motion for Summary Judgment Submission ( <i>See Ex. D, p. 2</i> )	796	1	\$0.15	\$119.40
200-210	2/22/18	City's Response to Plaintiffs' Motion for Summary Judgment and related filings; Plaintiffs' Response to the City's Motion for Summary Judgment and related filings ( <i>See Ex. D, p. 2</i> )	9	1	\$0.15	\$1.35
219	3/23/18	City's Corrected Motion to Strike Plaintiffs' Declarations Submitted in Support of Their Motion for Summary Judgment ( <i>See Ex. D, pp. 2-3</i> )	204	1	\$0.15	\$30.60
224	4/12/18	Plaintiffs' Response to the City's Local Rule 56.1(b)(3)(C) Statement of Additional Material Facts ( <i>See Ex. D, p. 3</i> )	181	1	\$0.15	\$27.15
235	11/15/18	City's Response to Plaintiffs' Motion to Supplement the Record ( <i>See Ex. D, p. 3</i> )	7	1	\$0.15	\$1.05

<b>COPYING COSTS – SEE EXHIBIT D</b>						
<b>Dkt. No.<sup>5</sup></b>	<b>Date Copy Was Made</b>	<b>Description</b>	<b>Pages</b>	<b>Copies</b>	<b>\$/Pg</b>	<b>Total</b>
	4/30/16	Copying and processing of hard copy Time and Attendance records the City produced to Plaintiffs. (See Ex. D, p. 4)		1		\$690.70
	5/23/16	Copying and processing of hard copy Time and Attendance records the City produced to Plaintiffs. (See Ex. D, p. 5)		1		\$230.57
	9/30/16	Copying and processing of SWAT logs/documents the City produced to Plaintiffs. (See Ex. D, p. 6)		1		\$283.52
<b>COPYING COSTS – TOTAL</b>						<b>\$2,505.89</b>

<b>RECOVERABLE COST CATEGORY</b>	<b>TOTAL</b>
Deposition Transcript Costs and Reporter Fees	\$15,725.45
Hearing Transcripts	\$720.35
Copying Costs	\$2,505.89
<b>TOTAL</b>	<b>\$18,951.69</b>

Date: October 31, 2019

Respectfully submitted,

CITY OF CHICAGO

By: /s/Matthew P. Kellam  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

Matthew P. Kellam, an attorney, hereby certifies that on October 31, 2019, he caused a copy of the foregoing **Itemization of Bill of Costs** in the above-captioned matter to be served on the Parties of Record listed below via the Court's ECF notice system, addressed to:

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/s/Matthew P. Kellam  
Matthew P. Kellam